



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

E-MAIL

Mr. Gary L. Jones
Site Director
Croda, Inc.
8 Croda Way
Mill Hall, PA 17751

Dear Mr. Jones:

The United States Environmental Protection Agency (EPA) is submitting this letter to request clarifying information based on a review of the records provided by Croda, Inc. (Croda) in response to EPA's January 14, 2015, Clean Air Act (CAA) 114 Information Request. On February 16, 2015, and March 30, 2015, Croda provided information and records in response to EPA's January 14, 2015, information request. Based on a review of the information and records submitted by Croda, EPA is requesting that Croda respond to the follow-up questions in Enclosure 1 to further explain the information and records that have been submitted. This request is being made in accordance with EPA's original January 14, 2015, CAA 114 Information Request, the definitions, terms and conditions of which remain in effect.

All information submitted in response to this request must be certified as true, correct, accurate and complete by an individual with sufficient knowledge and authority to make such representations on behalf of Croda. Please include the certification contained in Enclosure 2 in response to the questions in Enclosure 1.

EPA requires Croda to submit the information requested in Enclosure 1 no later than twenty one (21) calendar days after receipt of this letter. EPA requires that Croda report any changes or revisions to the information supplied within seven (7) days after the change or revision is made. This requirement to provide EPA with changed or revised information shall remain in effect until EPA provides Croda with written notice of its termination. Please submit your response to this request to:

Ms. Zelma Maldonado, Associate Director
U.S. Environmental Protection Agency Region III
Office of Air Enforcement & Compliance Assistance (3AP20)
1650 Arch Street
Philadelphia, PA 19103-2029



If you have any questions regarding the information being requested, please contact Gwendolyn Supplee from Office of Air Enforcement & Compliance Assistance staff at 215-814-2763.

Sincerely,



Zelma Maldonado
Associate Director
Office of Air Enforcement & Compliance Assistance

May 18, 2015



ENCLOSURE 1

- 1) What is the instrument response factor for the analyzer used by Croda (TVA 1000, Serial # 65626) for each compound for which Croda is measuring?
- 2) How does Croda verify the instrument response time for the analyzer used by Croda (TVA 1000, Serial # 65626) during daily analyzer calibrations performed prior to each monitoring activity?
- 3) For the annual LDAR monitoring, Croda indicated in its 114 response that it uses a third-party contractor, Team Industrial Services from Swedesboro, New Jersey. Please answer the following related to the annual LDAR monitoring performed:
 - a. Does the contractor use Croda's TVA (Serial # 65626) or does the contractor use its own analyzer? If the contractor uses its own analyzer, please provide copies of the calibrations for the contractor's equipment (quarterly instrument and daily calibrations during monitoring).
 - b. How many contracted people/day are used to perform the annual monitoring?
 - c. Do Croda personnel accompany the contractor during the daily monitoring activities for the annual LDAR monitoring? If Croda personnel accompany the contractor, please describe what their role is.
 - d. Please describe how Croda ensures that its contractor personnel are trained in Method 21 and facility-specific LDAR procedures, including Croda monitoring equipment, if Croda equipment is used for the annual monitoring activities.
- 4) Please provide the calculations that Croda has performed to determine that the monitoring frequency for its valves is Phase III using the formula found at 40 CFR Part 63.168(e).
- 5) When calculating the % leaking valves using the formula found at 40 CFR Part 63.168(e), please explain whether Croda includes those valves that are not subject to 40 CFR Part 63 Subpart PPP but has voluntarily elected to include in its LDAR program.
- 6) Please provide the calculations that Croda has performed to determine the monitoring frequency for its connectors is Phase III using the formula found at 40 CFR Part 63.174(i).
- 7) When calculating the % leaking connectors using the formula found at 40 CFR Part 63.174(i), please explain whether Croda includes those connectors that are not subject to 40 CFR Part 63 Subpart PPP but has voluntarily elected to include in its LDAR program.
- 8) Croda's semi-annual fugitive emission report for HON Subpart H for the period of 05/01/14-10/31/14 indicates that 2,555 valves, and 90 pumps were monitored for the period. However, the LDAR database provided by Croda on March 31, 2014, only show 1,956 monitoring records for that time period. Please explain the difference between what was reported on the semi-annual report and what is in the database for this time period.
- 9) Croda's semi-annual fugitive emission report for HON Subpart H for the period of 11/01/13-04/30/14 indicates that 2,598 valves, 72 pumps, 2,485 connectors, and 20



screwed connectors were monitored for the period. However, the LDAR database provided by Croda on March 31, 2014, shows 7,315 monitoring records for that time period. Please explain the difference between what was reported on the semi-annual report and what is in the database for this time period.

- 10) Croda's semi-annual fugitive emission report for HON Subpart H for the period of 05/01/13-10/31/13 indicates that 2,611 valves, 90 pumps, and 20 screwed connectors were monitored for the period. However, the LDAR database provided by Croda on March 31, 2014, shows 2,766 monitoring records for that time period. Please explain the difference between what was reported on the semi-annual report and what is in the database for this time period.
- 11) Croda's semi-annual fugitive emission report for HON Subpart H for the period of 11/01/12-04/30/13 indicates that 2,600 valves, 67 pumps, 2,501 connectors, and 20 screwed connectors were monitored for the period. However, the LDAR database provided by Croda on March 31, 2014, shows 7,315 monitoring records for that time period. Please explain the difference between what was reported on the semi-annual report and what is in the database for this time period.



ENCLOSURE 2:

STATEMENT OF CERTIFICATION

[This Certification is for signature by the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or another executive with authority to perform similar policy or decision-making functions of the corporation.]

Croda is submitting the enclosed documents in response to the U.S. Environmental Protection Agency's ("EPA") request for information, issued pursuant to Section 114(a) of the Clean Air Act, to determine whether the facility is in compliance with the Clean Air Act.

I certify that I am fully authorized by Croda to provide the above information on its behalf to EPA.

I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true, correct, accurate and complete. I am aware that there are significant penalties for submitting false statements and information, or omitting required statements and information, including the possibility of fines and imprisonment for knowing violations.

Date:

Name (Printed):

Signature:

Title:

